



Michael Eisenberg <mjeisenberg@gmail.com>

RE Unanswered Emails & Calls RE 2 Draft Letters to Court and Protective Order

14 messages

Michael Eisenberg <mjeisenberg@gmail.com>
To: "Corinthian, Shemori" <scorinth@law.nyc.gov>
Cc: brosenba@law.nyc.gov, mleight@law.nyc.gov

Wed, Apr 23, 2025 at 8:40 AM

Dear Ms. Corinthian,

I am writing again because I have not heard back from you since Friday morning regarding these matters. If I do not hear from you by 10 AM, I will upload my letter to the docket. Thank you so much.

Sincerely,
Michael Eisenberg

Michael Eisenberg <mjeisenberg@gmail.com>
To: "Corinthian, Shemori" <scorinth@law.nyc.gov>
Cc: brosenba@law.nyc.gov, mleight@law.nyc.gov

Wed, Apr 23, 2025 at 12:06 PM

Attached herewith the final version.

[Quoted text hidden]



Letter to Court RE Motion for Extension.pdf
283K

Corinthian, Shemori <scorinth@law.nyc.gov>
To: Michael Eisenberg <mjeisenberg@gmail.com>

Wed, Apr 23, 2025 at 12:34 PM

Received.

Shemori S. Corinthian

Senior Counsel | New York City Law Department

Labor and Employment Law Division

[100 Church Street, Rm 2-188](#) | New York, New York 10007

Office: (212) 356-4076

Cellphone: (917) 882-3617

[Email:scorinth@law.nyc.gov](mailto:scorinth@law.nyc.gov)

From: Michael Eisenberg <mjeisenberg@gmail.com>
Sent: Wednesday, April 23, 2025 12:07 PM
To: Corinthian, Shemori <scorinth@law.nyc.gov>
Cc: Rosenbaum, Bruce (Law) <BRosenba@law.nyc.gov>; Leighton, Maxwell (Law) <mleight@law.nyc.gov>
Subject: [EXTERNAL] Re: RE Unanswered Emails & Calls RE 2 Draft Letters to Court and Protective Order

CAUTION! EXTERNAL SENDER. Never click on links or open attachments if sender is unknown, and never provide user ID or password. If **suspicious**, report this email by hitting the **Phish Alert Button**. If the button is unavailable or you are on a mobile device, forward as an attachment to phish@oti.nyc.gov.

[Quoted text hidden]

Michael Eisenberg <mjeisenberg@gmail.com>
To: "Corinthian, Shemori" <scorinth@law.nyc.gov>

Wed, Apr 23, 2025 at 12:36 PM

Thank you very much.
[Quoted text hidden]

Corinthian, Shemori <scorinth@law.nyc.gov>
To: Michael Eisenberg <mjeisenberg@gmail.com>

Wed, Apr 23, 2025 at 3:25 PM

Good Afternoon:

As directed by the Court, I am writing to ask whether you consent to the proposed extension of the deadline for outstanding discovery (excluding the affidavit) to June 30, 2025, as set forth in my April 18, 2025 letter to the Court.

If you do not consent, please provide a brief explanation of your position.

Thanks,

[Quoted text hidden]

Michael Eisenberg <mjeisenberg@gmail.com>
To: "Corinthian, Shemori" <scorinth@law.nyc.gov>

Wed, Apr 23, 2025 at 4:48 PM

I do not consent. Please consult the letter that I sent to you and is now uploaded on the docket which gives my concerns.
[Quoted text hidden]

Michael Eisenberg <mjeisenberg@gmail.com>
To: "Corinthian, Shemori" <scorinth@law.nyc.gov>

Thu, Apr 24, 2025 at 7:30 AM

However please add the following. Plaintiff is concerned because upon information and belief he has learned that one of the defendants is moving to another state and he wishes to ensure that he is able to still to depose her.
[Quoted text hidden]

Michael Eisenberg <mjeisenberg@gmail.com>
To: "Corinthian, Shemori" <scorinth@law.nyc.gov>

Thu, Apr 24, 2025 at 7:32 AM

As regarding the protective order, I can send under the strict condition that you inform the court of the points I wished you to include that you refused in the initial protective order and that you have not yet replied to protective order covering my discoverable documents provided to defendants. As long as you include that language with the submission it is fine.
[Quoted text hidden]

Corinthian, Shemori <scorinth@law.nyc.gov>
To: Michael Eisenberg <mjeisenberg@gmail.com>

Thu, Apr 24, 2025 at 9:33 AM

I reject your characterization. You had the opportunity to review the protective order before you returned it to me. You signed it unchanged and I submitted it for the Court's approval, which the Court did. I did not force or coerce you to sign the document. The only inquiry you made prior to signing the document was about putting in language about your ability to challenge my assertion of privilege, I explained to you that there was currently no language in the order would prevent you from doing so, and I stated the language you were proposing might actually limit your ability to make such challenges. If you don't wish to have to finalize the protective order that fine, but please clearly articulate your reasoning so I can explain to the judge. I will write to her today.

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From: Michael Eisenberg <mjeisenberg@gmail.com>

Sent: Thursday, April 24, 2025 7:32 AM

[Quoted text hidden]

[Quoted text hidden]

Michael Eisenberg <mjeisenberg@gmail.com>
To: "Corinthian, Shemori" <scorinth@law.nyc.gov>

Thu, Apr 24, 2025 at 9:59 AM

I requested language that would allow for a challenge and you refused. You have not responded to my own protective order draft covering Plaintiffs discoverable materials with any response.

[Quoted text hidden]

Michael Eisenberg <mjeisenberg@gmail.com>
To: "Corinthian, Shemori" <scorinth@law.nyc.gov>

Thu, Apr 24, 2025 at 10:03 AM

And I reject your characterization. I consulted with experts on the subject and was informed that that was the appropriate ask and you insisted that that's not the way it was done...you did not explain to me and you are opposing counsel and are not acting in my interest. Please make sure to put my language in. You are free to contradict it.

On Thu, Apr 24, 2025, 9:33 AM Corinthian, Shemori <scorinth@law.nyc.gov> wrote:

[Quoted text hidden]

Michael Eisenberg <mjeisenberg@gmail.com>
To: "Corinthian, Shemori" <scorinth@law.nyc.gov>

Thu, Apr 24, 2025 at 10:21 AM

I agree to the protective order on the condition that you kindly state to the Court that

plaintiff notes that he agrees but had requested language that would allow for a challenge to assertions of privilege or confidentiality and Defense refused. Furthermore, Defense has not responded ever to plaintiff's protective order draft covering plaintiff's discoverable materials.

You are free to dispute this but please include my language exactly. You misrepresented to the Court my stance in writing on an extension for the affidavit and have misrepresented other language elsewhere as in both joint letters of status.

On Thu, Apr 24, 2025, 9:33 AM Corinthian, Shemori <scorinth@law.nyc.gov> wrote:

I reject your characterization. You had the opportunity to review the protective order before you returned it to me. You signed it unchanged and I submitted it for the Court's approval, which the Court did. I did not force or coerce you to sign the document. The only inquiry you made prior to signing the document was about putting in language about your ability to challenge my assertion of privilege, I explained to you that there was currently no language in the order would prevent you from doing so, and I stated the language you were proposing might actually limit your ability to make such challenges. If you don't wish to have to finalize the protective order that fine, but please clearly articulate your reasoning so I can explain to the judge. I will write to her today.

The highlighted never was stated. I reject your assertion that you stated this. You misrepresented my willingness to an extension for the affidavit to the Court, not noting that it was contingent on the terms offered, which you have not

accepted or responded to. This is documented as is your misrepresentation of my agreement in both joint letters of status, both which you submitted on the docket without providing a copy of the final version.

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From: Michael Eisenberg <mjeisenberg@gmail.com>

Sent: Thursday, April 24, 2025 7:32 AM

To: Corinthian, Shemori <scorinth@law.nyc.gov>

Subject: Re: [EXTERNAL] Re: RE Unanswered Emails & Calls RE 2 Draft Letters to Court and Protective Order

[Quoted text hidden]

Corinthian, Shemori <scorinth@law.nyc.gov>

Thu, Apr 24, 2025 at 10:33 AM

To: Michael Eisenberg <mjeisenberg@gmail.com>

I will not be submitting that information to the Court I don't see why the Court needs to know that information if you are agree to move forward with the finalized version. If you want to agree to the protective order and write separately, you can do so but I wouldn't agree to write to the Court under those circumstances.

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From: Michael Eisenberg <mjeisenberg@gmail.com>

Sent: Thursday, April 24, 2025 10:21:10 AM

[Quoted text hidden]

[Quoted text hidden]

Michael Eisenberg <mjeisenberg@gmail.com>

Thu, Apr 24, 2025 at 11:38 AM

To: "Corinthian, Shemori" <scorinth@law.nyc.gov>

Do what you need to do. You already had my final word

[Quoted text hidden]